

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Lihua International, Inc. Shareholder  
Derivative Action

CASE NO.: 14-cv-03543-RA-RLE

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR  
FINAL APPROVAL OF PROPOSED SETTLEMENT AND AN AWARD OF  
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that upon the Declaration of Stuart J. Guber in Support of Plaintiffs' Unopposed Motion for Final Approval of Shareholder Derivative Settlement, Award of Attorneys' Fees and Reimbursement of Expenses and exhibits thereto, Declaration of Timothy W. Brown and exhibit thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings, Plaintiffs Sreeram Arshanapally and Eric Morrison (the "Plaintiffs"), derivatively on behalf of Lihua International, Inc. ("Lihua" or the "Company") hereby move this Court, at the United States District Court for the Southern District of New York, before the Honorable Ronnie Abrams, located at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order entering a Final Order and Judgment granting: (1) final approval of the proposed Settlement; (2) Plaintiffs' Counsel's application for an award of attorneys' fees and reimbursement of expenses, (3) Plaintiffs' application for service awards; and (4) granting such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing concerning Plaintiffs' Motion to consider the above on October 5, 2017, at 10:00 a.m. in Courtroom 1506, 40 Foley Square, New York, NY 10007.

Lihua and the Individual Settling Defendants do not oppose this motion.

Dated: September 14, 2017

Respectfully submitted,

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